

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF MISSISSIPPI**

Will McRaney,

Plaintiff,

v.

The North American Mission Board of the  
Southern Baptist Convention, Inc.,

Defendant.

Case No. 1:17-cv-00080-GHD-DAS

**DECLARATION OF SCOTT E. GANT**

I, Scott E. Gant, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am an attorney licensed to practice law in the District of Columbia, a member in good standing of the District of Columbia Bar, and admitted to appear *pro hac vice* before this Court. I am an attorney with Boies Schiller Flexner LLP (“BSF”), and counsel of record for Plaintiff, Dr. Will McRaney, in this matter. I make this declaration based upon my personal knowledge of the facts stated herein, and if called to testify, I could and would testify competently thereto. I submit this declaration in support of Dr. McRaney’s opposition to NAMB’s motion for summary judgment. Doc. 263, 264.

2. Attached hereto as Exhibit H is a true and correct copy of excerpts from Carlos Ferrer’s Deposition Transcript dated September 23, 2022.

3. Attached hereto as Exhibit I is a true and correct copy of excerpts from Steve Davis’s Deposition Transcript dated February 9, 2023.

4. Attached hereto as Exhibit J is a true and correct copy of excerpts from Danny de Armas's Deposition Transcript dated February 16, 2023.
5. Attached hereto as Exhibit K is a true and correct copy of excerpts from Kevin Ezell's Deposition Transcript dated March 2, 2023.
6. Attached hereto as Exhibit L is a true and correct copy of excerpts from Bill Barker's Deposition Transcript dated May 1, 2023.
7. Attached hereto as Exhibit M is a true and correct copy of excerpts from Danny Wood's Deposition Transcript dated September 28, 2022, and accompanying Exhibit 15.
8. Attached hereto as Exhibit N is a true and correct copy of Defendant NAMB's 30(b)(6) Deposition Transcript dated March 3, 2023, and accompanying Exhibits 10 and 11.
9. Attached hereto as Exhibit O is a true and correct copy of excerpts from Tom Wigginton's Deposition Transcript dated November 3, 2022.
10. Attached hereto as Exhibit P is a true and correct copy of excerpts from Sandy McRaney's Deposition Transcript dated February 7, 2023.
11. Attached hereto as Exhibit Q is a true and correct copy of excerpts from Rob Paul's Deposition Transcript dated February 28, 2023.
12. Attached hereto as Exhibit R is a true and correct copy of Clint Scott's Declaration dated February 15, 2023.
13. Attached hereto as Exhibit S is a true and correct copy of Steve Wolverton's Declaration dated February 9, 2023.

14. Attached hereto as Exhibit T is a true and correct copy of Rick Wheeler's Declaration dated November 21, 2022.

15. Attached hereto as Exhibit U is a true and correct copy of Joel Breidenbaugh's Declaration dated February 8, 2023.

16. Attached hereto as Exhibit V is a true and correct copy of Plaintiff's Amended Objections and Fifth Supplemental Responses to NAMB's First Set of Interrogatories dated March 3, 2023.

17. Attached hereto as Exhibit W is a true and correct copy of Plaintiff's Third Set of Requests for Production dated September 5, 2022.

18. Attached hereto as Exhibit X are true and correct copies of bates numbered discovery documents cited throughout Plaintiff's Memorandum in Support of its Opposition to Defendant's Motion for Summary Judgment, and Plaintiff's Rule 56(c) Objections and Responses.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 1, 2023

A handwritten signature in blue ink, appearing to read "J. B. E. Hunt", is written over a horizontal line.